

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Joann Ferrer

Debtor

CHAPTER 13

Toyota Motor Credit Corporation

Movant

vs.

NO. 17-10306 MDC

Joann Ferrer

Debtor

William C. Miller, Esq.

Trustee

11 U.S.C. Section 362

**STIPULATION OF SETTLEMENT**

This matter having been brought before the Court on a Motion to Determine Value of Property filed by the Debtor through her counsel Brandon J. Perloff, Esquire and response thereto filed by Thomas I. Puleo, Esquire, attorney for Movant, Toyota Motor Credit Corporation, and the parties having resolved said matter as hereinafter set forth and by the agreement of all counsel the parties hereby stipulate:

IT IS STIPULATED:

1. That Toyota Motor Credit Corporation is the holder of a first purchase money security interest on the Debtor on the Debtor's 2014 Toyota Camry.
2. That the Debtor agrees to pay Toyota Motor Credit Corporation the sum of \$10,500.00 plus interest at the rate of 3.25% through her bankruptcy plan.
3. That the parties agree that a facsimile signature shall be considered an original signature.
4. That in the event this case is dismissed or converted to a Chapter 7, this Stipulation shall be null and closed.

We hereby agree to the form and entry of this Order:

Date: March 29, 2018

By: /s/ Kevin G. McDonald, Esquire  
Kevin G. McDonald, Esquire  
Attorney for Movant/Creditor  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
(215) 627-1322 FAX (215) 627-7734

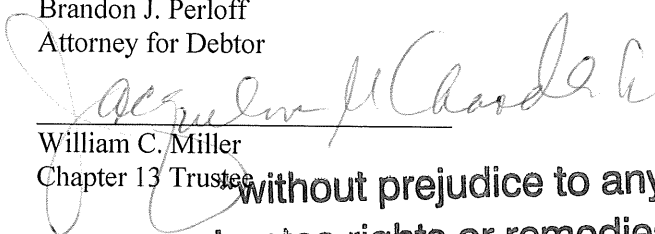
Date: \_\_\_\_\_

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/s/ Brandon J. Perloff

Brandon J. Perloff

Attorney for Debtor

Date: 3/28/18

  
William C. Miller

Chapter 13 Trustee

**without prejudice to any  
trustee rights or remedies**

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2017. However, the court  
retains discretion regarding entry of any further order.

\_\_\_\_\_  
Bankruptcy Judge  
Jean K. Fitzsimon